

Exhibit B

NEXSEN | PRUET

Angus H. Macaulay
Member
Certified Specialist in
Employment and Labor Law
Certified South Carolina Mediator
Admitted in SC

August 30, 2021

VIA ELECTRONIC MAIL

Prisma Health
c/o Elizabeth Bradley, Esquire
Elizabeth.bradley@prismahealth.org
2 Office Park Court, Suite 103
Columbia, SC 29223

Re: Doe v. American University of Antigua
Case No.: 4:20-cv-04445-JD
Subpoena issued to Prisma Health

Dear Ms. Bradley:

I represent the American University of Antigua.

I understand that Prisma Health is being served or was recently served with a *subpoena duces tecum* by counsel for Emily Doe in the above referenced matter.

Please be advised that American University of Antigua has filed a Motion for Protective Order and/or Motion to Quash the Subpoena that was issued to you. Therefore, I request that Prisma Health not respond to the subpoena until such time as the court has ruled on this motion.

With copy to counsel for Plaintiff Doe, Desa Ballard, Esquire, I am informing her of this communication and the request. If and when Prisma Health's responses are required, we will contact you directly.

Austin
Charleston
Charlotte
Columbia
Greensboro
Greenville
Bluffton / Hilton Head
Myrtle Beach
Raleigh

1230 Main Street
Suite 700 (29201)
PO BOX 2426
Columbia, SC 29202
www.nexsenpruet.com

T (803) 253-8279
F 803.727.1465
E AMacaulay@nexsenpruet.com
Nexsen Pruet, LLC
Attorneys and Counselors at Law

August 30, 2021
Page 2

Very truly yours,

A handwritten signature in cursive script, reading "Angus H. Macaulay". The signature is written in black ink and is positioned above the typed name.

Angus H. Macaulay
AHM/mjm

cc: Desa Ballard, Esq. (via electronic mail)



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VIA ELECTRONIC MAIL

Campbell University/Conway Medical Center
Attn: Bret Barr, President & CEO
c/o Wendy Causey
wcausey@cmc-sc.com
300 Singleton Bridge Road
Conway, SC 29526

Re: Doe v. American University of Antigua
Case No.: 4:20-cv-04445-JD
Subpoena issued to Campbell University/Conway Medical Center

Dear Mr. Barr:

Austin

Charleston

Charlotte

Columbia

Greensboro

Greenville

Bluffton / Hilton Head

Myrtle Beach

Raleigh

I represent the American University of Antigua.

I understand that Campbell University/Conway Medical Center is being served or was recently served with a subpoena duces tecum by counsel for Emily Doe in the above referenced matter.

Please be advised that American University of Antigua has filed a Motion for Protective Order and/or Motion to Quash the Subpoena that was issued to you. Therefore, I request that Campbell University/Conway Medical Center not respond to the subpoena until such time as the court has ruled on this motion.

With copy to counsel for Plaintiff Doe, Desa Ballard, Esquire, I am informing her of this communication and the request. If and when Campbell University/Conway Medical Center's responses are required, we will contact you directly.

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Admitted in SC

August 30, 2021

VIA ELECTRONIC MAIL

Grand Strand Regional Medical Center
Attn: Keri Melson
keri.melson@hcahealthcare.com
809 82nd Parkway
Myrtle Beach, SC 29572

Re: Doe v. American University of Antigua
Case No.: 4:20-cv-04445-JD
Subpoena issued to Grand Strand Regional Medical Center (2) and
Subpoena issued to Grand Strand Regional Medical Center-Family Medicine
Residency Program

Austin

Dear Keri:

Charleston

I represent the American University of Antigua.

Charlotte

Columbia

I understand that Grand Strand Regional Medical Center is being served or was recently served with 3 *subpoena duces tecum* by counsel for Emily Doe in the above referenced matter.

Greensboro

Greenville

Bluffton / Hilton Head

Please be advised that American University of Antigua has filed a Motion for Protective Order and/or Motion to Quash the Subpoenas that were issued to you. Therefore, I request that Grand Strand Regional Medical Center not respond to the subpoenas until such time as the court has ruled on this motion.

Myrtle Beach

Raleigh

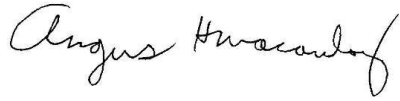
With copy to counsel for Plaintiff Doe, Desa Ballard, Esquire, I am informing her of this communication and the request. If and when Grand Strand Regional Medical Center's responses are required, we will contact you directly.

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Certified South Carolina Mediator
Admitted in SC

August 30, 2021

VIA ELECTRONIC MAIL

Medical University of South Carolina
Attn: Stewart Mixon, MA
mixonsa@musc.edu
171 Ashley Ave.
Charleston, SC 29425

Re: Doe v. American University of Antigua
Case No.: 4:20-cv-04445-JD
Subpoena issued to Medical University of South Carolina and Medical
University of South Carolina Family Medicine Residency Program

Dear Mr. Mixon:

Austin

Charleston

Charlotte

Columbia

Greensboro

Greenville

Bluffton / Hilton Head

Myrtle Beach

Raleigh

I represent the American University of Antigua.

I understand that the Medical University of South Carolina is being served or was recently served with two *subpoena duces tecum* by counsel for Emily Doe in the above referenced matter.

Please be advised that American University of Antigua has filed a Motion for Protective Order and/or Motion to Quash the Subpoenas that were issued to you. Therefore, I request that the Medical University of South Carolina not respond to the subpoenas until such time as the court has ruled on this motion.

With copy to counsel for Plaintiff Doe, Desa Ballard, Esquire, I am informing her of this communication and the request. If and when the Medical University of South Carolina's responses are required, we will contact your directly.

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Certified South Carolina Mediator
Admitted in SC

August 30, 2021

VIA ELECTRONIC MAIL

University of South Carolina School of Medicine-Midlands and Upstate
Attn: Jeffrey Perkins
perkinJL@mailbox.sc.edu
15 Medical Park, Suite 300
Columbia, SC 29203

Re: Doe v. American University of Antigua
Case No.: 4:20-cv-04445-JD
Subpoena issued to University of South Carolina School of Medicine-
Midlands and University of South Carolina School of Medicine-Upstate

Dear Mr. Perkins:

Austin

Charleston

Charlotte

Columbia

Greensboro

Greenville

Bluffton / Hilton Head

Myrtle Beach

Raleigh

I represent the American University of Antigua.

I understand that University of South Carolina School of Medicine - Midlands and Upstate is being served or was recently served with two *subpoena duces tecum* by counsel for Emily Doe in the above referenced matter.

Please be advised that American University of Antigua has filed a Motion for Protective Order and/or Motion to Quash the Subpoenas that were issued to you. Therefore, I request that the University of South Carolina School of Medicine – Midlands and Upstate not respond to the subpoenas until such time as the court has ruled on this motion.

With copy to counsel for Plaintiff Doe, Desa Ballard, Esquire, I am informing her of this communication and the request. If and when University of South Carolina School of Medicine – Midlands’ and Upstate’s responses are required, we will contact you directly.

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Angus H. Macaulay
AHM/mjm

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VIA ELECTRONIC MAIL

Voorhees College
c/o Fred A. Williams, Esquire
fwilliams@gsblaw.net
Gignilliat, Savitz & Bettis, LLP
900 Elmwood Avenue, Suite 100
Columbia, SC 29201

Re: Doe v. American University of Antigua
Case No.: 4:20-cv-04445-JD
Subpoena issued to Voorhees College

Dear Mr. Williams:

Austin

Charleston

Charlotte

Columbia

Greensboro

Greenville

Bluffton / Hilton Head

Myrtle Beach

Raleigh

I represent the American University of Antigua.

I understand that Voorhees College is being served or was recently served with two *subpoena duces tecum* by counsel for Emily Doe in the above referenced matter.

Please be advised that American University of Antigua has filed a Motion for Protective Order and/or Motion to Quash the Subpoenas that were issued to you. Therefore, I request that Voorhees College not respond to the subpoenas until such time as the court has ruled on this motion.

With copy to counsel for Plaintiff Doe, Desa Ballard, Esquire, I am informing her of this communication and the request. If and when Voorhees College's responses are required, we will contact you directly.

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